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FCC Mailroom

NFIB
 The Voice of Small Business
 1201 F Street NW, Suite 200
 Washington, DC 20004

Before the
 FEDERAL COMMUNICATIONS COMMISSION
 Washington, D.C.

In the matter of:

Nationwide Number Portability;
 Numbering Policies for Modern
 Communications

) WC Docket No. 17-244

) WC Docket No. 13-97

December 12, 2017

TO: Secretary of the Commission
 Office of the Secretary
 Federal Communications Commission
 445 12th St. SW
 Washington, DC 20554

DOCKET FILE COPY ORIGINAL

RE: Comments on Notices of Proposed Rulemaking and of Inquiry, "Nationwide
 Number Portability; Numbering Policies for Modern Communications,"
 WC Docket Nos. 17-244 and 13-97, 82 *Fed. Reg.* 55970 (November 27, 2017)

1. The National Federation of Independent Business (NFIB) responds to the Federal Communications Commission (FCC or Commission) notices of proposed rulemaking (NPRM) and of inquiry (NOI) on "Nationwide Number Portability; Numbering Policies for Modern Communications," published in the *Federal Register* of November 27, 2017.

2. NFIB is an incorporated nonprofit association with approximately 300,000 members across the country. NFIB protects and advances the ability of Americans to own, operate, and grow their businesses and, in particular, ensures that the governments of the United States and the fifty states hear the voice of small business as they formulate public policies. NFIB advances the interests of small and independent businesses, most if not all of whom use telephone communications in their businesses.

3. NFIB supports prompt implementation of the innovation of nationwide number portability for all telephone technologies, both for portability among locations and portability among service providers, taking proper account of the need for stability in communications services during innovation and the costs to customers and to providers, including providers that are small businesses, of accomplishing the innovation.

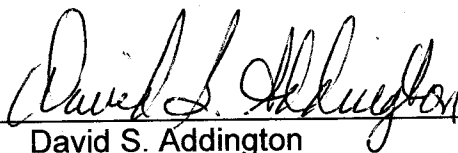
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4. Many small businesses, and especially those participating in the click-or-call economy, depend in large part for their success on the ability of current and potential customers to contact them with ease. A small business that changes its email address, its website address, or its telephone number makes it more difficult for a customer to communicate with the business. Many small businesses depend upon communication with customers by telephone for a substantial portion of their business.

5. Many small businesses change locations, whether a short move across town or a distant move across the country. Existing local number portability policies may help a small business keep its number in a local move, but a small business that makes a distant move may have no alternative but to change telephone numbers.

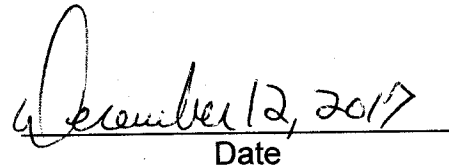
6. Small businesses may hesitate to move from a poorly-performing telecommunications provider to a provider with better service or prices if the business must give up its current telephone number to make the switch. Such hesitation reduces competition in the telecommunications market and results in less choice, worse service, and higher prices for customers than would otherwise prevail in a market in which small businesses were free to move their business to another provider without losing their telephone number.

7. Nationwide number portability, as the next step from wireline local number portability and wireless number portability toward complete number portability, would help small businesses solve the problems described in paragraphs 4 through 6 above. Nationwide number portability would help small businesses (a) keep a steady channel of communication with their customers, (b) make distant moves that may benefit the business, and (c) enjoy the benefits of free market competition.



David S. Addington

Senior Vice President and General Counsel
National Federation for Independent Business, Inc.



Date